



Pillsbury Winthrop Shaw Pittman LLP
31 West 52nd Street | New York, NY 10019-6131 | tel 212.858.1000 | fax 212.858.1500

Carolina A. Fornos
tel: 212.858.1558
carolina.fornos@pillsburylaw.com

November 29, 2021

BY ECF

The Honorable Brian M. Cogan
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Force, et al. v. Qatar Charity, et al.*, 1:20-cv-02578-BMC

Dear Judge Cogan:

Counsel for Masraf Al Rayan (“MAR”) writes pursuant to Rule I.E of Your Honor’s Individual Practices, and with Plaintiffs’ consent, to request an extension of time to respond to the Complaint until January 31, 2022.

On November 28, 2021, Plaintiffs requested a determination of relatedness, pursuant to Rule 50.3.1 of the Guidelines for the Division of Business Among District Judges, Eastern District of New York (“the Guidelines”), for this case and two other actions, *Henkin, et al. v. Qatar Charity, et al.*, No. 1:21-cv-05716-AMD-VMS (ECF No. 21), and *Przewozman, et al. v. Qatar Charity, et al.*, No. 1:20-cv-06088-NGG-RLM (ECF No. 29). In the latter action, the Court has agreed to extend the deadline for MAR’s response to the Complaint to January 31, 2022.¹ Accordingly, MAR respectfully requests an extension to allow time for the judicial determination of relatedness of these actions and to provide MAR, a foreign defendant, sufficient time to respond to the allegations in the Complaint. Pursuant to Rule 50.3.1(d) of the Guidelines, MAR has until December 6, 2021 to file a response to Plaintiffs’ request for a judicial determination of relatedness in the *Henkin* and *Przewozman* actions.

This is MAR’s first request for an extension. This request would not have an impact on any other scheduled dates; the next status conference is currently scheduled for February 9, 2022.

¹ Plaintiffs assert that MAR and Qatar National Bank were properly served in all three actions on November 8, 2021, allegedly triggering a response deadline of November 29, 2021. (ECF No. 24; *see also Przewozman, et al. v. Qatar Charity, et al.*, No. 1:20-cv-06088-NGG-RLM, ECF No. 25 at 1.)

November 29, 2021

Page 2 of 2

Respectfully submitted,

/s/ Carolina A. Fornos

Carolina A. Fornos

Aryeh L. Kaplan (*pro hac vice pending*)

Markenzy Lapointe (*pro hac vice pending*)

Counsel for Defendant Masraf Al Rayan

cc: All parties of record (by ECF)